

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
EVERETTE JOSEPH ROGERS and	:	
KARISSA MARIE ROGERS,	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
EVERETTE JOSEPH ROGERS and	:	
KARISSA MARIE ROGERS,	:	
Respondents	:	CASE NO. 1-24-bk-03049-HWV

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 17<sup>th</sup> day of June 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reasons:

1. Debtors' Plan violates 11 U.S.C. § 1322(a)(1) and § 1325(b) in that Debtors have not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtors' disposable income is greater than that of which is committed to the Plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Average gross monthly income. Trustee requests verification of the amount on Line 2.
  - b. Trustee disputes Line 46 deductions.
2. Trustee avers that Debtors' Plan is not feasible based upon the following:
- a. The Plan is underfunded relative to claims to be paid – 100% Plan.
3. Trustee avers that Debtors' Plan cannot be administered due to the lack of the following:
- a. Both Debtors have not provided Trustee with paystubs for May 2025.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 17<sup>th</sup> day of June 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Nicholas G. Platt, Esquire  
Mooney Law  
230 York Street  
Hanover, PA 17331

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee